

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF:

United States of America,
v.

Jason Dawson
2009 Darbywine Drive
Charlotte, North Carolina 28216

Case No: 2:24-mj-231

MAGISTRATE JUDGE: Vascura

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joseph Smith (Your Affiant), a Task Force Officer (TFO) with Homeland Security Investigations (HSI), of the United States Department of Homeland Security (DHS), being duly sworn, hereby depose and state:

INTRODUCTION

1. I, HSI TFO Joseph Smith (your affiant), make this affidavit in support of a criminal complaint to arrest Jason **DAWSON** for violations of Title 18 United States Code §§ 2251, 2252, and 2252A – the sexual exploitation of a minor and the distribution, receipt, and/or possession of child pornography. The statements contained in this affidavit are based in part on information and analysis provided by law enforcement agents; written reports about this and other investigations that I have received, and your affiant’s personal knowledge and finding during the investigation. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that **DAWSON** committed the violations listed above.
2. I am a Detective with the Franklin County Sheriff’s Office (FCSO) and have been a Task Force Officer (TFO) with Homeland Security Investigations (HSI) since March of 2023. I am currently assigned to the Internet Crimes Against Children Task Force. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children.
3. During my career as a TFO, I have led and participated in various state and federal investigations involving computer-related offenses. I have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple law enforcement agencies around the United States, focusing on cyber-terrorism, financial crimes, and narcotics trafficking in addition to my current role. As part of my duties as a Task Force Officer, I investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I

have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media.

4. Prior to joining the FCSO, I received my B.A from The Ohio State University in International Studies- Security and Intelligence. I have since graduated with distinction receiving my M.B.A. specializing in fraud and forensic examination from Tiffin University. During my employment, I have received numerous forensic trainings from the International Society of Forensic Computer Examiners, private forensic software companies, Internet Crimes Against Children conferences, and formal and informal training with state and federal partners. I am the 2023 recipient of the National Center for Missing and Exploited Children Hero Award.

FACTS SUPPORTING PROBABLE CAUSE

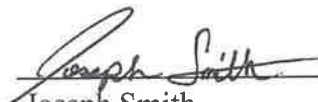
5. In November of 2023, the Columbus Division of Police (CPD) began an investigation into **DAWSON** based on reports made by two females, herein after Jane Doe One (DOB: 5/XX/2004) and Jane Doe Two (DOB: 7/XX/2004). More specifically, Jane Doe One and Jane Doe Two reported that **DAWSON**, who was their high school basketball coach, had engaged in sexual relationships with both Jane Does while they were 16 years old.
6. On or about November 15, 2023, law enforcement with CPD conducted an interview with Jane Doe One at her residence. Jane Doe One explained that **DAWSON** was a teacher at Worthington Christian High School located at 1485 Lazelle Road in Westerville, Ohio 43081. Jane Doe One had been a student there and **DAWSON** was both her teacher and basketball coach. **DAWSON** would instruct Jane Doe One to meet him in the closet of his office where he eventually began to have a sexual relationship with Jane Doe One, including oral and vaginal intercourse. Jane Doe One indicated that **DAWSON** would sometimes record their sex acts.
7. Jane Doe One then provided CPD with text messages between her and **DAWSON** as well as a video of her and **DAWSON** engaged in oral and vaginal intercourse for which Jane Doe Two indicated she was either 17 or 18 in the video.
8. Jane Doe One stated she and Jane Doe Two, who were both former students at Worthington Christian, began conversing and discovered that they both had been having sex with **DAWSON** during the same time frame which prompted them to report **DAWSON** to CPD.
9. On or about December 19, 2023, law enforcement with CPD interviewed Jane Doe Two at her residence. Jane Doe Two explained that she met **DAWSON** her sophomore year at Worthington Christian High School where she was a 16-year-old student, and he was her basketball coach. In November of 2020, **DAWSON** had Jane Doe Two meet him in a classroom after practice where he kissed her.
10. Jane Doe Two informed law enforcement that on January 13, 2021, when she was approximately 16 years of age, she met **DAWSON** in an apartment complex parking lot where they had sex in the back of his vehicle. She and **DAWSON** then continued to engage in sex acts in his vehicle and in hotel rooms and Jane Doe Two confirmed that **DAWSON** sometimes recorded their sex acts. Jane Doe Two provided CPD her phone which contained

four videos of her and **DAWSON** with metadata indicating they were created on or about November 23, 2021, December 17, 2021, December 20, 2021 and October 3, 2022. In the videos, Jane Doe Two was filmed by **DAWSON** performing oral sex on him or having vaginal intercourse with him in his vehicle and at the time, Jane Doe Two was approximately sixteen or seventeen years of age.

11. On or about March 23, 2024, criminal complaints for **DAWSON** were issued out of Franklin County, Ohio Municipal Court for violation of the Ohio Revised Code (ORC) Section 2907.03-A9 for Sexual Battery, a felony in the third degree as well as ORC Section 2907.322-A1 for Pandering Sexually Oriented Material Involving a Minor, a felony in the second degree. An accompanying Franklin County arrest warrant for **DAWSON** was issued that same day.
12. On or about March 25, 2024, **DAWSON** was arrested by law enforcement, to include personnel from North Carolina as well as CPD. In addition, CPD officers advised **DAWSON** of his *Miranda* warnings and he agreed to speak with them. During the interview, **DAWSON** stated he remembered making and sending the videos depicting sex acts between him and Jane Doe One and him and Jane Doe Two and indicated he knew it was illegal because he was their coach.

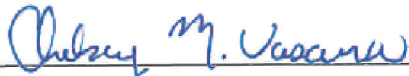
CONCLUSION

13. Based upon the above information, your affiant submits there is probable cause to believe Jason **DAWSON** has committed violations of Title 18 U.S.C. §§ 2251, 2252, and 2252A – the sexual exploitation of a minor, distribution, receipt, and/or possession of child pornography. Therefore, your affiant respectfully requests this court to issue a criminal complaint and arrest warrant.



Joseph Smith
Task Force Officer
Homeland Security Investigations

Sworn to and subscribed before me this 30th day of April, 2024.



Chelsey M. Vascara
United States Magistrate Judge
United States District Court
~~Middle District of Pennsylvania~~ Southern District of Ohio